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Attorneys for the Plan Administrator

In re:

BLOCKFI INC., *et al.*,
Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered under a Confirm Plan²)

**APPLICATION FOR ORDER SHORTENING TIME FOR NOTICE OF
WIND-DOWN DEBTORS' MOTION TO QUASH SUBPOENA FOR RULE
2004 EXAMINATION**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the “Plan”) [Docket No. 1609].

TO: THE HONORABLE CHIEF JUDGE MICHAEL B. KAPLAN UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

BlockFi Inc. and its debtor affiliates (collectively, “BlockFi” or the “Wind-Down Debtors”), as managed by the Plan Administrator in the above-referenced Chapter 11 cases (the “Chapter 11 Cases”), by and through their undersigned counsel, request that the time period to notice a hearing on the *Debtors’ Motion to Quash Subpoena for Rule 2004 Examination* (the “Motion to Quash”) as required by FED. R. BANKR. P. 2002 be shortened pursuant to FED. R. BANKR. P. 9006(c)(1), for the reason(s) set forth below:

1. Contemporaneously herewith, the Debtors filed the Motion to Quash. The Motion to Quash seeks to quash the Rule 2004 Subpoena (the “Subpoena”) requesting the production of documents in relation to the Wind-Down Debtors’ objection to Claim #7233.

2. The Debtors respectfully request that the Court enter the proposed order (the “Order”) attached hereto as **Exhibit A**, scheduling a hearing on the Motion to Quash on November 6, 2023 at 10:00 a.m. ET. Shortened notice is required because:

- the Objection to Claim #7233 is set for hearing on November 6, 2023;
- although the Subpoena does not have a return date it was issued on October 20, 2023, so under D.N.J. LBR 2004-1(c) the production could be due as early as November 3, 2023; and
- opposing counsel was advised of the intention to file the Motion to Quash on October 26, 2023.

3. A shortened notice period will not prejudice any parties and is not prohibited under FED. R. BANKR. P. 9006(c)(1).

WHEREFORE, the Debtors respectfully request entry of the Order shortening the notice period for the Motion to Quash, and for such other and further relief as the Court may deem just and appropriate.

Respectfully Submitted,

Dated: October 30, 2023

/s/ Daniel M. Stolz

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EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)
(Jointly Administered under a Confirmed Plan²)

Hearing Date: November 6, 2023 @ 11:00
a.m. ET

**ORDER SHORTENING TIME PERIOD FOR NOTICE OF WIND-DOWN
DEBTORS' MOTION TO QUASH SUBPOENA FOR RULE 2004
EXAMINATION**

The relief set forth on the following page number two (2) is **ORDERED**.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

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Debtors: BlockFi Inc.

Case No. 22-19361(MBK)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE OF WIND-DOWN DEBTORS' MOTION TO QUASH SUBPOENA FOR RULE 2004 EXAMINATION

<p>BROWN RUDNICK LLP Kenneth J. Aulet, Esq. (admitted <i>pro hac vice</i>) Seven Times Square New York, New York 10036 (212) 209-4800 kaulet@brownrudnick.com</p> <p>BROWN RUDNICK LLP Tristan Axelrod, Esq. (admitted <i>pro hac vice</i>) One Financial Center Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com</p> <p><i>Attorneys for the Plan Administrator</i></p> <p>GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com</p> <p><i>Local Counsel for the Plan Administrator</i></p>	<p>HAYNES AND BOONE, LLP Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Lauren M. Sisson, Esq. (NJ Bar No. 394182022) 30 Rockefeller Plaza, 26th Floor New York, New York 10112 (212) 659-7300 richard.kanowitz@haynesboone.com lauren.sisson@haynesboone.com</p> <p><i>Attorneys for the Plan Administrator</i></p>
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Upon review of the *Application for Order Shortening Time for Notice of Debtors' Motion to Quash Subpoena for Rule 2004 Examination* (the "Application")¹ of the above-captioned debtors and debtors in possession (collectively, the "Wind-Down Debtors") for entry of an order (this "Order") requesting that the time period for the Motion to Quash be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1) and a hearing scheduled at the Court's earliest convenience,

IT IS HEREBY ORDERED THAT:

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

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Debtors: BlockFi Inc., et. al.

Case No. 22-19361(MBK)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE OF DEBTORS'
MOTION TO QUASH SUBPOENA FOR RULE 2004 EXAMINATION

1. A hearing will be conducted on the Motion to Quash on November ____ , 2023 at _____ prevailing Eastern Time before the Honorable Chief Judge Michael B. Kaplan, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.

2. The Debtors must serve a copy of this Order, and all related documents, to all parties in interest by either overnight mail or email, as applicable.

3. Service must be made on the same day as the date of this Order.

4. Notice by telephone is not required.

5. Any objections to the Motion to Quash may be presented orally at the hearing.

6. Parties may request to appear by Zoom by contacting Chambers prior to the return date.

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